

Remarks & Arguments

In the Office Action, the Examiner noted that Claims 1-21 are pending in the application, and that Claims 1-21 are rejected. By this amendment, Claims 1, 3, 4, 6, 8-11, 15, 17, 18 and 20 have been amended, Claims 2, 5, 12, 13, 16 and 19 have been canceled without prejudice, and Claims 22-24 have been added. Thus, Claims 1, 3, 4, 6-11, 14, 15, 17, 18 and 20-24 are pending in the application. The amendments to the claims do not add new matter to the application. The Examiner's rejections are traversed below.

*Rejections Under 35 U.S.C. 103*

Claims 1, 3, 4, 6, 7, 8-14 and 15-21 stand rejected under 35 U.S.C. 103 as being obvious in view of the combination of U.S. Patent No. 6,243,707 to Humpleman, U.S. Patent No. 6,567,807 to Robels and U.S. Patent No. 6,760,535 to Orr. Applicants respectfully traverse the rejection of Claims 1-21 on the basis that the relied upon references do not teach every element in the independent Claims 1, 8 and 15 as amended.

With regard to **Claim 1**, the Applicants respectfully assert that neither Humpleman, Robels nor Orr teach or suggest "accessing a network service database containing a plurality of service offerings that aggregate capabilities of a plurality of devices coupled as a network." Instead, Humpleman teaches accessing HTML pages contained in the respective devices (col. 2, lines 26-31). Robels does not teach or suggest service offerings of a plurality of device and

accordingly does not teach or suggest a network service database that aggregates such offerings. Orr only teaches storing content in a database on a single device.

Applicants also respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “determining one or more resources of said network for carrying out said service-based request from said network service database, wherein said resources include one or more source devices, one or more destination devices and one or more communication links.” In contrast, Humpleman teaches determining one or more devices from a device link page. Again Robels does not teach or suggest a network of device for carrying out a request, or a network service database. Orr does not teach or suggest determining one or more devices for carrying out a request.

Applicants also respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “constructing a service request list based on said device-specific events, wherein said service request list is arranged as a hierarchical data structure, that includes a top level and one or more lower levels, wherein said top level includes a handle logically associated with said service-based request, and descriptive information and timing information for carrying out said service-based request, and wherein a lower level includes one or more logical links between said resources, and one or more device-specific commands for carrying out the service-based request by said resources.” Instead, Humpleman teaches a plurality of HTML pages, stored in respective devices, that do not have a hierarchical structure. Even if the HTML pages were arranged in a hierarchical structure, Humpleman does not teach the arrangement of parameters in the top level

and one or more lower levels as recited in Claim 1. Furthermore, neither Robles nor Orr teach or suggest a service request list that is based on device-specific events.

For each of the reasons set forth above, Applicants respectfully submit that Claim 1 is patentable over Humpleman, Robels, Orr and any combination thereof. Accordingly, Applicants request that the obviousness rejection of Claim 1 be withdrawn and that Claim 1 be allowed.

**Claims 3, 4, 6, 7 and 23** are allowable by virtue of their dependency on respective base Claim 1, as well as the additional elements they recite. Accordingly, Applicants respectfully request that the obviousness rejection of Claims 3, 4, 6, 7 and 23 be withdrawn and that Claims 3, 4, 6, 7 and 23 be allowed.

With regard to **Claim 8**, the Applicants respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “accessing a network service database containing a plurality of service offerings that aggregate capabilities of a plurality of devices.” Instead, Humpleman teaches accessing HTML pages contained in the respective devices (col. 2, lines 26-31). Robels does not teach or suggest service offerings of a plurality of device and accordingly does not teach or suggest a network service database that aggregates such offerings. Orr only teaches storing content in a database on a single device.

Applicants also respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “determining one or more resources for carrying out said service-based request from said network service database.” In contrast, Humpleman teaches determining one or more devices from a device link page. Again Robels does not teach or suggest a network of device for

carrying out a request, or a network service database. Orr does not teach or suggest determining one or more devices for carrying out a request.

Applicants also respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “constructing a service request list based on said device-specific events, wherein said service request list is arranged as a hierarchical data structure, that includes a top level and one or more lower levels, wherein said top level includes a handle logically associated with said service-based request and timing information for carrying out said service-based request, and wherein a lower level includes one or more logical links between said resources, and one or more device-specific commands for carrying out said service-based request by said resources.” Instead, Humpleman teaches a plurality of HTML pages, stored in respective devices, that do not have a hierarchical structure. Even if the HTML pages were arranged in a hierarchical structure, Humpleman does not teach the arrangement of parameters in the top level and one or more lower levels as recited in Claim 8. Furthermore, neither Robles nor Orr teach or suggest a service request list that is based on device-specific events.

For each of the reasons set forth above, Applicants respectfully submit that Claim 8 is patentable over Humpleman, Robels, Orr and any combination thereof. Accordingly, Applicants request that the obviousness rejection of Claim 8 be withdrawn and that Claim 8 be allowed.

**Claims 9-11, 14 and 24** are allowable by virtue of their dependency on respective base Claim 8, as well as the additional elements they recite. Accordingly, Applicants respectfully request that the obviousness rejection of Claims 9-11, 14 and 24 be withdrawn and that Claims 9-11, 14 and 24 be allowed.

With regard to **Claim 15**, the Applicants respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “logic for accessing a network service database containing a plurality of service offerings that aggregate capabilities of a plurality of devices.” Instead, Humpleman teaches accessing HTML pages contained in the respective devices (col. 2, lines 26-31). Robels does not teach or suggest service offerings of a plurality of device and accordingly does not teach or suggest a network service database that aggregates such offerings. Orr only teaches storing content in a database on a single device.

Applicants also respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “logic for determining one or more resources of said network for carrying out said service-based request from said network service database, wherein said resources include one or more source devices, one or more destination devices and one or more communication links, wherein said resources include one or more source devices, one or more destination devices and one or more communication links.” In contrast, Humpleman teaches determining one or more devices from a device link page. Again Robels does not teach or suggest a network of device for carrying out a request, or a network service database. Orr does not teach or suggest determining one or more devices for carrying out a request.

Applicants also respectfully assert that neither Humpleman, Robels nor Orr teach or suggest “logic for constructing a service request list based on said device-specific events, wherein said service request list is arranged as a hierarchical data structure, that includes a top level and one or more lower levels, wherein said top level includes a handle logically associated with said service-based request, and descriptive information and timing information for carrying

out said service-based request, and wherein a lower level includes one or more logical links between said resources, and one or more device-specific commands for carrying out the service-based request by said resources.” Instead, Humpleman teaches a plurality of HTML pages, stored in respective devices, that do not have a hierarchical structure. Even if the HTML pages were arranged in a hierarchical structure, Humpleman does not teach the arrangement of parameters in the top level and one or more lower levels as recited in Claim 15. Furthermore, neither Robles nor Orr teach or suggest a service request list that is based on device-specific events.

For each of the reasons set forth above, Applicants respectfully submit that Claim 15 is patentable over Humpleman, Robels, Orr and any combination thereof. Accordingly, Applicants request that the obviousness rejection of Claim 15 be withdrawn and that Claim 15 be allowed.

**Claims 17, 18 and 20-22** are allowable by virtue of their dependency on respective base Claim 15, as well as the additional elements they recite. Accordingly, Applicants respectfully request that the obviousness rejection of Claims 17, 18 and 20-22 be withdrawn and that Claims 17, 18 and 20-22 be allowed.

#### Conclusion

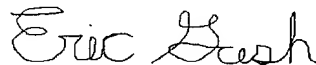
For all the reasons advanced above, Applicants respectfully submit that the present application is in condition for allowance and that action is earnestly solicited. The Examiner is

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invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

The Commissioner is hereby authorized to charge any additional fees, which may be required for this amendment, or credit any overpayment, to Deposit Account 504160. In the event that an extension of time is required, or may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account 504160.

Respectfully submitted,  
MURABITO, HAO & BARNES LLP



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